

haynesboone

September 8, 2021

**VIA ECF AND EMAIL**

Magistrate Sarah L. Cave  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1670  
New York, NY 10007  
Cave\_NYSDChambers@nysd.uscourts.gov

**Re: JLM Couture, Inc. v. Hayley Paige Gutman  
20-cv-10575-LTS-SLC**

Dear Judge Cave:

Counsel for Plaintiff JLM Couture, Inc. (“JLM”) and Joseph Murphy (“Mr. Murphy”) and Defendants Hayley Paige Gutman (“Hayley”) and Conrad Louis Clevlen (“Conrad”) (collectively, “Parties”) in the above-referenced action jointly submit this letter-motion pursuant to Rule I.A of Your Honor’s Individual Rules to request an extension to file the Protocols for the Preservation of Certain ESI (“ESI Preservation Protocols”) that are currently due on September 8, 2021, to September 10, 2021.

The Parties seek two additional days to file the ESI Preservation Protocols—up to and including September 10, 2021. The parties have recently met and conferred to address outstanding issues and have exchanged edits over the past several days. However, due to the Labor Day holiday and the Jewish High Holidays, the parties have been unable to finalize the stipulation and receive client sign off today, as originally anticipated. Two additional days will provide the Parties with sufficient time to finalize the submission of the ESI Preservation Protocols.

This request will not affect any other deadlines in this Case, and as noted above all parties consent to this joint request.

Thank you for your consideration.

Respectfully submitted,

*s/Tiffany M. Cooke/*

Tiffany M. Cooke

cc: counsel of record (via ECF)

The parties' letter-motion requesting an extension of the deadline to submit their proposed ESI Preservation Protocol (the "ESI Protocol") (ECF No. 235) is GRANTED. The parties shall submit the ESI Protocol by **Friday, September 10, 2021**.

The Clerk of Court is respectfully directed to close ECF No. 235.

SO ORDERED 9/9/2021

  
SARAH L. CAVE  
United States Magistrate Judge

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